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Attorneys for Defendants,

**David P. Kreizer, Amanda Ibrahim, Evan Marx, Mary Carroll Santorelli,
Josh Edelstein, Diana Navarrete, Abigail Rios, Kristen Fone and
Kreizer Law**

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JUDD SHAW, P.A. and JUDD B. SHAW,
ESQ.

Plaintiffs,

v.

DAVID B. KREIZER, ESQ., AMANDA
IBRAHIM, ESQ., EVAN MARX, ESQ.,
MARY CARROLL SANTORELLI,
JOSH EDELSTEIN, DIANA
NAVARRETE, ABIGAIL RIOS,
KRISTEN FONE, JOHN DOES 1-10
(said names being fictitious); and
KREIZER LAW (said name being
fictitious)

Defendants.

Civil Action No.: 3:19-cv-12237

**APPLICATION PURSUANT TO L.R. 6.1(b)
FOR A CLERK'S ORDER EXTENDING THE
TIME TO ANSWER, REPLY, MOVE, OR
OTHERWISE RESPOND TO PLAINTIFFS'
COMPLAINT BY 14 DAYS**

Application is hereby made pursuant to Local Rule 6.1(b) for a Clerk's Order extending the time within which Defendants David P. Kreizer, Amanda Ibrahim, Evan Marx, Mary Carroll Santorelli, Josh Edelstein, Diana Navarrete, Abigail Rios, Kristen Fone and Kreizer Law may answer, reply, move or otherwise respond to the Amended Complaint filed by Plaintiff herein by 14 days. It is represented that:

1. No previous extension of time to answer, reply, move or otherwise respond to the Complaint has been obtained by Defendants.
2. Plaintiffs initially served a copy of their Verified Complaint along with their Order to Show Cause on April 25, 2019.
3. On May 6, 2019, Plaintiffs served a copy of their Amended Complaint.
4. On May 7, 2019, Defendants filed a Notice of Removal removing this matter to the United States District Court for the District of New Jersey from the Chancery Division of the Monmouth County Superior Court.
5. Pursuant to Fed. R. Civ. P. 15(a)(3), any required response to an amended pleading must be made within the time remaining to respond to the original pleading or within 14 days after service of the amended pleading, whichever is later.
6. Defendants' time to respond to Plaintiffs' Amended Complaint currently expires on May 20, 2019.
7. A 14-day extension of time to respond pursuant to Local Rule 6.1(b) would extend Defendants' time to answer, reply, move or otherwise respond to the Amended Complaint to June 3, 2019.

PASHMAN STEIN WALDER HAYDEN P.C.
Attorneys for Defendants

Dated: May 16, 2019

By: /s/ Samuel J. Samaro
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The above application is ORDERED GRANTED and the time within which Defendants may answer, reply, move or otherwise respond to the Amended Complaint filed by Plaintiff is hereby extended to June 3, 2019.

ORDER DATED: _____

WILLIAM T. WALSH, CLERK

By: _____